

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN

Plaintiff,

v.

CHRISTOPHER ELLIS BOUZY, *et al.*,

Defendants.

21-CV-10878 (AT) (JLC)

**DECLARATION OF B. BRETT HEAVNER IN SUPPORT OF DEFENDANTS
ACADEMY OF TELEVISION ARTS & SCIENCES, SHARP, AND ESQUENET'S
JOINT MOTION FOR ATTORNEYS' FEES**

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GARRETT & DUNNER, LLP

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Television Arts & Sciences and Margaret
Esquenet*

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I, B. BRETT HEAVNER, declare as follows:


1. I am a partner at Finnegan, Henderson, Farabow, Garrett & Dunner, LLP and am counsel for the Academy of Television of Arts & Sciences (“ATAS”) and Margaret Esquenet in this action. I make this declaration in support of Defendants ATAS, Sharp, and Esquenet’s Joint Motion for Attorneys’ Fees (the “Motion”). The facts in this declaration are based on my personal knowledge. If called upon to do so, I would testify competently to the facts contained in this declaration.

2. I am personally familiar with the attorneys’ fees ATAS and Esquenet incurred in defending this action. Pursuant to Fed. R. Civ. P. 54(d)(2)(B)(iii), a fair estimate of ATAS and Esquenet’s attorneys’ fees incurred to date in this litigation is approximately \$55,000.

3. Should the Court grant the Motion, with the Court’s permission, ATAS and Esquenet will submit a fee application setting forth and substantiating the reasonableness of their attorneys’ fees (including counsel billing rates and number of hours billed), with appropriate supporting documentation.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Executed on July 12, 2023 in Washington, D.C.



B. Brett Heavner